

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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LISA PRINCE,

Plaintiff,

Case No. 1:25-cv-3679 (NCM)(CLP)

**ANSWER**

-against-

TIVOLI BI LLC,  
STELLAR MANAGEMENT,  
CULLEN & ASSOCIATES, P.C. and  
KEVIN CULLEN,

Defendants.

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Defendants Cullen & Associates, P.C. and Kevin Cullen (“Cullen Defendants”) by their attorneys, Kaufman Dolowich LLP, hereby respond to Plaintiff’s Complaint as follows:

1. The Cullen Defendants deny the allegations contained in paragraph 1 of the Complaint.

2. The Cullen Defendants state that paragraph 2 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

3. The Cullen Defendants deny the allegations contained paragraph 3 of the Complaint.

4. The Cullen Defendants deny the allegations contained in paragraph 4 of the Complaint.

5. The Cullen Defendants deny the allegations contained in paragraph 5 of the Complaint.

6. The Cullen Defendants deny the allegations contained in paragraph 6 of the Complaint.

7. The Cullen Defendants deny the allegations contained in paragraph 7 of the Complaint.

8. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. The Cullen Defendants do not dispute this Court's jurisdiction as set forth in paragraph 9 of the Complaint.

10. The Cullen Defendants deny the validity of the state law claims asserted in paragraph 10 of the Complaint.

11. The Cullen Defendants deny that declaratory relief is available as alleged in paragraph 11 of the Complaint.

12. The Cullen Defendants do not dispute the venue as alleged in paragraph 12 of the Complaint.

13. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 13 of the Complaint.

14. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 14 of the Complaint.

15. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 15 of the Complaint.

16. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 16 of the Complaint.

17. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 17 of the Complaint.

18. The Cullen Defendants admit the allegations contained in paragraph 18 of the Complaint except deny that this suit arises of its business.

19. The Cullen Defendants state that paragraph 19 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

20. The Cullen Defendants admit the allegations contained in paragraph 20 of the Complaint.

21. The Cullen Defendants state that paragraph 21 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

22. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 22 of the Complaint.

23. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 23 of the Complaint.

24. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 24 of the Complaint.

25. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 25 of the Complaint.

26. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 26 of the Complaint.

27. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 27 of the Complaint.

28. The Cullen Defendants deny the allegations contained in paragraph 28 of the Complaint.

29. The Cullen Defendants deny the allegations contained in paragraph 29 of the Complaint.

30. The Cullen Defendants deny the allegations contained in paragraph 30 of the Complaint.

31. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 31 of the Complaint.

32. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 32 of the Complaint and refer the Court to the document referenced therein for its content and wording.

33. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 33 of the Complaint and refer the Court to the document referenced therein for its content and wording.

34. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 34 of the Complaint and refer the Court to the document referenced therein for its content and wording.

35. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 35 of the Complaint and refer the Court to the document referenced therein for its content and wording.

36. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 36 of the Complaint.

37. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 37 of the Complaint.

38. The Cullen Defendants deny the allegations contained in paragraph 38 of the Complaint.

39. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 39 of the Complaint and refer the Court to the document referenced therein for its content and wording.

40. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 40 of the Complaint and refer the Court to the document referenced therein for its content and wording.

41. The Cullen Defendants deny the allegations contained in paragraph 41 of the Complaint.

42. The Cullen Defendants deny the allegations contained in paragraph 42 of the Complaint.

43. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 43 of the Complaint.

44. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 44 of the Complaint.

45. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 45 of the Complaint.

46. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 46 of the Complaint.

47. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 47 of the Complaint.

48. The Cullen Defendants deny the allegations contained in paragraph 48 of the Complaint.

49. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 49 of the Complaint and refer the Court to the document referenced therein for its content and wording.

50. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 50 of the Complaint.

51. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 51 of the Complaint.

52. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 52 of the Complaint.

53. The Cullen Defendants deny the allegations contained in paragraph 53 of the Complaint.

54. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 54 of the Complaint.

55. The Cullen Defendants deny the allegations contained in paragraph 55 of the Complaint.

56. The Cullen Defendants deny the allegations contained in paragraph 56 of the Complaint.

57. The Cullen Defendants deny the allegations contained in paragraph 57 of the Complaint.

58. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 58 of the Complaint.

59. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 59 of the Complaint.

60. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 60 of the Complaint.

61. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 61 of the Complaint.

62. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 62 of the Complaint.

63. The Cullen Defendants deny the allegations contained in paragraph 63 of the Complaint.

64. The Cullen Defendants deny the allegations contained in paragraph 64 of the Complaint.

65. The Cullen Defendants deny the allegations contained in paragraph 65 of the Complaint.

66. The Cullen Defendants deny the allegations contained in paragraph 66 of the Complaint.

67. The Cullen Defendants deny the allegations contained in paragraph 67 of the Complaint.

68. The Cullen Defendants deny the allegations contained in paragraph 68 of the Complaint.

69. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 69 of the Complaint and refer the Court to the document referenced therein for its content and wording.

70. The Cullen Defendants state that paragraph 70 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

71. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 71 of the Complaint and refer the Court to the document referenced therein for its content and wording.

72. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 72 of the Complaint and refer the Court to the document referenced therein for its content and wording.

73. The Cullen Defendants deny the allegations contained in paragraph 73 of the Complaint.

74. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 74 of the Complaint and refer the Court to the document referenced therein for its content and wording.

75. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 75 of the Complaint and refer the Court to the document referenced therein for its content and wording.

76. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 76 of the Complaint and refer the Court to the document referenced therein for its content and wording.

77. The Cullen Defendants state that paragraph 77 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

78. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 78 of the Complaint and refer the Court to the document referenced therein for its content and wording.

79. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 79 of the Complaint and refer the Court to the document referenced therein for its content and wording.

80. The Cullen Defendants deny the allegations contained in paragraph 80 of the Complaint.

81. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 81 of the Complaint and refer the Court to the document referenced therein for its content and wording.

82. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 82 of the Complaint and refer the Court to the document referenced therein for its content and wording.

83. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 83 of the Complaint and refer the Court to the document referenced therein for its content and wording.

84. The Cullen Defendants state that paragraph 84 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

85. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 85 of the Complaint and refer the Court to the document referenced therein for its content and wording.

86. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 86 of the Complaint and refer the Court to the document referenced therein for its content and wording.

87. The Cullen Defendants deny the allegations contained in paragraph 87 of the Complaint.

88. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 88 of the Complaint and refer the Court to the document referenced therein for its content and wording.

89. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 89 of the Complaint and refer the Court to the document referenced therein for its content and wording.

90. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 90 of the Complaint and refer the Court to the document referenced therein for its content and wording.

91. The Cullen Defendants state that paragraph 91 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

92. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 92 of the Complaint and refer the Court to the document referenced therein for its content and wording.

93. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 93 of the Complaint and refer the Court to the document referenced therein for its content and wording.

94. The Cullen Defendants deny the allegations contained in paragraph 94 of the Complaint.

95. The Cullen Defendants neither admit nor deny the allegations contained in paragraph 95 of the Complaint and refer the Court to the document referenced therein for its content and wording.

**AS AND FOR AN ANSWER TO THE FIRST CLAIM**

96. The Cullen Defendants repeat, reallege, and reaffirm their responses to paragraphs 1 to 95 of the Complaint as if set forth fully herein.

97. The Cullen Defendants state that paragraph 97 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

98. The Cullen Defendants state that paragraph 98 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

99. The Cullen Defendants state that paragraph 99 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations

100. The Cullen Defendants state that paragraph 100 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

101. The Cullen Defendants state that paragraph 101 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

102. The Cullen Defendants deny the allegations contained in paragraph 102 of the Complaint.

103. The Cullen Defendants deny the allegations contained in paragraph 103 of the Complaint.

104. The Cullen Defendants deny the allegations contained in paragraph 104 of the Complaint.

105. The Cullen Defendants deny the allegations contained in paragraph 105 of the Complaint.

106. The Cullen Defendants deny the allegations contained in paragraph 106 of the Complaint.

107. The Cullen Defendants deny the allegations contained in paragraph 107 of the Complaint.

**AS AND FOR AN ANSWER TO THE SECOND CLAIM**

108. The Cullen Defendants repeat, reallege, and reaffirm their responses to paragraphs 1 to 107 of the Complaint as if set forth fully herein.

109. The Cullen Defendants state that paragraph 109 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

110. The Cullen Defendants deny the allegations contained in paragraph 110 of the Complaint.

111. The Cullen Defendants deny the allegations contained in paragraph 111 of the Complaint.

112. The Cullen Defendants deny the allegations contained in paragraph 112 of the Complaint.

113. The Cullen Defendants deny the allegations contained in paragraph 113 of the Complaint.

114. The Cullen Defendants deny the allegations contained in paragraph 114 of the Complaint.

115. The Cullen Defendants deny the allegations contained in paragraph 115 of the Complaint.

116. The Cullen Defendants deny the allegations contained in paragraph 116 of the Complaint.

117. The Cullen Defendants deny the allegations contained in paragraph 117 of the Complaint.

118. The Cullen Defendants deny the allegations contained in paragraph 118 of the Complaint.

119. The Cullen Defendants deny the allegations contained in paragraph 119 of the Complaint.

120. The Cullen Defendants deny the allegations contained in paragraph 120 of the Complaint.

**AS AND FOR AN ANSWER TO THE THIRD CLAIM**

121. The Cullen Defendants repeat, reallege, and reaffirm their responses to paragraphs 1 to 120 of the Complaint as if set forth fully herein.

122. The Cullen Defendants state that paragraph 122 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

123. The Cullen Defendants state that paragraph 123 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

124. The Cullen Defendants deny the allegations contained in paragraph 124 of the Complaint.

**AS AND FOR AN ANSWER TO THE THIRD CLAIM**

125. The Cullen Defendants repeat, reallege, and reaffirm their responses to paragraphs 1 to 124 of the Complaint as if set forth fully herein.

126. The Cullen Defendants deny the allegations contained in paragraph 126 of the Complaint.

127. The Cullen Defendants deny the allegations contained in paragraph 127 of the Complaint.

128. The Cullen Defendants deny the allegations contained in paragraph 128 of the Complaint.

129. The Cullen Defendants deny the allegations contained in paragraph 129 of the Complaint.

130. The Cullen Defendants deny the allegations contained in paragraph 130 of the Complaint.

131. The Cullen Defendants state that paragraph 131 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

132. The Cullen Defendants state that paragraph 132 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

133. The Cullen Defendants deny the allegations contained in paragraph 133 of the Complaint.

134. The Cullen Defendants deny the allegations contained in paragraph 134 of the Complaint.

135. The Cullen Defendants deny the allegations contained in paragraph 135 of the Complaint.

**AS AND FOR AN ANSWER TO THE FIFTH CLAIM**

136. The Cullen Defendants repeat, reallege, and reaffirm their responses to paragraphs 1 to 135 of the Complaint as if set forth fully herein.

137. The Cullen Defendants state that paragraph 137 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

138. The Cullen Defendants state that paragraph 138 of the Complaint contains a legal conclusion and therefore a response is not required. If a response is required, the Cullen Defendants deny the allegations contained in this paragraph.

139. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 139 of the Complaint.

140. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 140 of the Complaint.

141. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 141 of the Complaint.

142. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 142 of the Complaint.

143. The Cullen Defendants deny having knowledge or information sufficient to form a belief as to the allegations contained in paragraph 143 of the Complaint.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

144. Plaintiff has not suffered concrete injuries in fact sufficient to confer standing under Article III.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

145. Plaintiff's claims are barred, in whole or in part, under the applicable statutes of limitation.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

146. Plaintiff's claims are barred, in whole or in part, by the doctrines of release and waiver.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE**

147. The Complaint fails to state a claim upon which relief can be granted.

**AS AND FOR A FIFTH AFFIRMATIVE DEFENSE**

148. Any alleged violation of the FDCPA did not result in any actual harm and/or damages.

**AS AND FOR A SIXTH AFFIRMATIVE DEFENSE**

149. The Complaint is barred, in whole or in part, by *res judicata* and collateral estoppel.

**AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE**

150. The Complaint is barred, in whole or in part, by accord and satisfaction.

**WHEREFORE**, the Cullen Defendants respectfully pray for judgment as follows:

- a. Dismissing the Complaint with prejudice; and
- b. Granting the Cullen Defendants such other and further relief as this Court deems just, equitable and proper.

Dated: Woodbury, New York  
September 19, 2025

**KAUFMAN DOLOWICH LLP**

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